

CHRISTIAN FAMILY LIFE CENTER, INC.

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Joan Bystrom, MSW, LCSW
Executive Director

December 12, 2003

Edward Betancourt
U.S. Department of State
CA/OCS/PRI
Adoption Regulations Docket Room
2201 C Street NW,
Washington D.C. 20520
Adoptionregs@state.gov

Re: Docket number: State/AR-01/96

Dear Mr. Betancourt:

Please accept this letter and the following commentary as my "Commentary" on Proposed Rules as written by the Department of State. Main points to be demonstrated are:

- A. That the rules as set forth by the Department of State are redundant to existing laws and regulations of each State's Licensing Authority who govern child placing agencies. Further that some rules set forth by the Department are unnecessary and punitive. That the Department has failed to acknowledge the present infrastructure within each state to regulate its own State Licensed Child Placing Agencies for the purpose of performing international adoption. Further, that by the nature of the proposed rules, the Department has failed to defer to a State's rights to regulate and govern their own Licensed Child Placing Agencies for the purpose of conducting international and domestic adoption.
- B. That there should be one rule governing "accreditation" with regard to what makes an agency accredited. Basically, if an agency is licensed within its own State of origin to perform adoption services, internationally and domestically, it should automatically be "accredited" with the State Department and Convention to perform international adoption services.

Proposed Rule For Accreditation of Agencies:

The US Department of State and the Bureau of Consular Affairs has the authority to designate one or more accrediting entities. It therefore recognizes and designates each State's Licensing Authority and entity to give "approval" and "license" and/or "accreditation" to Child Placing Agencies for the purpose of conducting international adoptions within the purview of their respective State laws and regulations, Federal laws and rules of the INS. The US Department of State, and the Bureau of Consular Affairs will accept a State Licensed Child Placing Agency approved by its State Licensing Authorities as an "accredited agency" to provide adoption services for Convention adoptions.

It is evident that much work has gone into the composition of the proposed rules by the Department. Your efforts have been appreciated, as I know you had an important job to do.

However, the premise for the rules and the rules themselves are flawed, and need to be seriously re-written. Whatever time you have placed into the composition of these rules will not compare to the millions of collective hours that we as dedicated State Licensed Child Placing Agencies have put into building our agencies, advocating for children all over the world and in the United States. We collectively represent persons with millions of hours of education and continued training in law, social work, juvenile justice, administrative, medicine, advanced education, finance, and business. We undergo annual or bi-annual re-licensing both as agencies and as professionals, through our own Professional State Licensing Authorities. We are required to continue on with our education. We train our clients. We follow strict and meaningful rules regarding juvenile justice, assessments of adoptive parents, birth parent and child information. What we exhibit in our work is a passion for uniting the orphan child with his/her adoptive family, working with birth parents, and working with our friends (agencies) in foreign countries. We have a love for democracy, our law and our country.

The composition of these rules was a job for the authors, which they endeavor to be over with soon. This is not a reason for the rules to be approved as they are written. The dedicated State Licensed Agencies, adoptive parents, and children will be left with the results of these rules, which left as stand, will result in the loss of hundreds of jobs, the loss of agencies, and the prohibition of adoptive parents to afford adoption. Most of all, children will die in foreign countries, because the

dedicated agencies were forced out of business by the Department rules. The author of the rules will go onto another project.

When one reads these proposed rules, it is evident that they represent for the most part what we as licensed child placing agencies presently follow to complete a lawful adoption in countries all over the world. They included rules that the INS have set forth, and guidelines that are followed and enforced in the US Embassy's all over the world. However, you have added additional rules, which go behind the mandate of the Hague Convention's mission. You have gone beyond the mandate of the IAA to create "minimum rules for accreditation." For what reasons? As the rules read, one can conclude that these rules form a good guideline for a country that does not have a democracy, licensing regulations, or a professional authoritative body governing child welfare or adoption.

However, this is not our current situation in the USA.

Foundation for Below Recommended Rule for Accreditation:

A. High Standards for International Adoption already in place within the USA:

1. The concept and practice of lawful adoption through United States of America adoption agencies was well instituted and established long before the concept of the Hague Convention.
2. The United States of America through its State licensed child placement agencies maintains the highest standard of accreditation governing adoption practices in the world.
3. State licensed agencies are presently regulated in the USA at:
 - a. State levels through laws and rules set forth by their State Legislature and enforced by each State's Division of Family Services.
 - b. Each Licensed Social Worker is further governed by State professional licensing rules set forth by their respective State Legislature.
 - c. Each licensed agency is required to adhere to the laws, and rules set out by the INS (now under the Home Land Security).
 - d. Each state imposes criminal, civil restrictions and penalties on practices that are not in alignment with the already established regulations and laws.
 - e. Federal penalties are in place through the INS rules.
 - f. Each state's local juvenile court further oversees the legality of a foreign adoption through the recognition of the foreign adoption or a re-adoption process through the court.
 - g. In the United States of America there are State laws and Federal laws presently in place that prohibit the trafficking of children, abduction of children and abuse of children.

In this commentary we are recommending and proposing one rule regarding accreditation of agencies and that is:

Proposed rule:

The US Department of State and the Bureau of Consular Affairs has the authority to designate one or more accrediting entities. It therefore recognizes and designates each State's Licensing Authority and entity to give "approval" and "license" and/or "accreditation" to Child Placing Agencies for the purpose of conducting international adoptions within the purview of their respective State laws and regulations, Federal laws and rules of the INS. The US Department of State, and the Bureau of Consular Affairs will accept a State Licensed Child Placing Agency approved by its State Licensing Authorities as an "accredited agency" to provide adoption services for Convention adoptions

As was written within your Proposed Rules (54066 Under U.S. Ratification of Convention) a statement: "From October 199 to September 2002 a total of 59,079 children were issued orphan visas to immigrate to the United States in connection with their adoption." I ask you: Were these children trafficked into the US, kidnapped, or abducted? OR were these lawful adoptions handled by USA licensed adoption agencies under regulations of their State and the INS? I believe that a system can always be improved upon, however, the Department rules want to fix a wheel that was not broken and break a strong, solid wheel in the process. In that breaking you will cause thousands of adoptive parents and children and dedicated workers to suffer.

We all play a vital role in adoption. I ask that the rules as written be re-written to defer to the authority of the State Licensing Authorities for accreditation, and assign the Department the duty to record, and intervene, and educate with regard to intercountry adoptions.

Yours truly,

Joan Bystrom, MSW, LCSW
Executive Director

Attachment: Commentary – further pages – following
Copy submitted electronically as well on December 12, 2003

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December 12, 2003

U.S. Department of State
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Adoption Regulations Docket Room
2201 C Street NW,
Washington D.C. 20520
Adoptionregs@state.gov

Re: Two Original Copies – sent Federal Express
Referencing: Docket number State/AR-01/96

- I. *Regarding: III. The 1993 Hague Convention on Protection of Children and Cooperation in Respect of Intercountry Adoption.*
 - A. *Development of the Hague Convention on Intercountry Adoption.*

We agree with the mission and principles to protect children as written:
That the Convention was the first international instrument to recognize that intercountry adoption could offer the advantage of a permanent home to a child for whom a suitable family cannot be found in his or her state of origin. (S. Treaty Doc. L05-51, at 1).

 1. *The best interest of a child would not be served by arbitrarily prohibiting a child in need of a permanent family placement from being matched with and adoptive family simply because the family resided in another country.*
 2. *That the Convention reflects a consensus that an intercountry adoption may well be in individual child's best interest.*
 3. *That the objectives of the Convention are:*
 - a. *To establish safeguards to ensure that intercountry adoptions take place in the best interest of the child and with respect for the child's fundamental rights as recognized in international law.*
 - b. *Second, to establish a system of cooperation among contracting states to ensure that those safeguards are respected and thereby prevent the abduction, sale, or traffic of children, and*
 - c. *Third, to secure the recognition in contracting states of adoption made in accordance with the Convention.*
 - d. *That parties are required to act expeditiously in the process of adoption.*

- e. *That to accomplish the goals, the Convention make a number of significant modifications to current intercountry adoption practices.*
1. *First, the Convention mandates a close coordination between the government of contracting countries through a central authority in each Convention Country, sharing information about the laws of its own and other Convention countries and monitoring individual cases.*
 2. *Second, the Convention requires that each country involved make certain determinations before an adoption may proceed. Sending country must determine in advance that the child is eligible to be adopted; that it is in the child's best interest to be adopted and consent of birth parents, institutions or authorities necessary under law of country of origin have been obtained freely and in writing and that the consent of the child if required has been obtained.*
 3. *Sending country must prepare a child background study that includes a medical history of the child, as well as the other background information.*
 4. *The receiving country must determine in advance that the prospective parents are eligible and suited to adopt, and that they have received counseling that the child will be eligible to enter and to reside permanently in the receiving country.*
 5. *Receiving country must also prepare a home study on the prospect adoptive parents. These advance determinations and studies are designed to ensure that the child is protected and that there are not obstacles to completing the adoption.*
 6. *That the United States strongly supports that the Convention's purpose and principles and believes that U.S. ratification will further the critical goals of protecting children and families involved in intercountry adoptions.*

COMMENTS: The above is in place at present with regard to intercountry adoptions as they are completed within the boundaries of State Licensed Child Placing Agencies within the USA. The INS, and the U.S. Embassy's further make sure that a child is eligible for adoption. The Courts in the foreign countries along with approved foundation or agents in each country further make sure that a child is eligible for adoption within the guidelines of the country and the INS.

- II. *Regarding: C. Use of Private, Accredited Adoption Service Providers.*
Reference is made to what is written on page 54066 and on page 54067 that states:
- A. *The United States advocated for parties to have the option of using private adoption service providers to complete Convention tasks.*
 - B. *In the United States, private non-profit adoption service providers currently handle the majority of U.S. intercountry adoption cases.*

- C. *In its final form, the Convention permits party countries to choose to use private Convention-accredited adoption services provider to perform Central Authority tasks.*
- D. *Specifically, Article 22 permits private, non-profit adoption service providers instead of Central Authorities to complete certain Central Authority functions required by the Convention.*
- E. *As discussed below, however, private for-profit providers may perform such functions as authorized under Article 22 (2), which imposes limitations that do not apply to private non profit providers.*
- F. *By including a provision allowing non-governmental bodies to provide Adoption services, the Convention recognizes the critical role private bodies play and historically have played in the intercountry adoption process.*
- G. *Recognizing also, the role of private, for-profit adoption service providers in the United States, the Senate gave its advice and consent to the ratification of the Convention subject to a declaration, pursuant to Article 22 (2) of the Convention that the U.S. Central Authority functions under Article 15 to 21 of the Convention may be performed by approved private, for-profit adoption providers. (14 Congr. Rec. S8860 (daily ed Sept. 20, 2000)).*
- H. *Consistent with Article 22 of the Convention and the declaration just discussed the LAA establishes a system of accredit private non-profit, and to approve for-profit adoption service providers and outlines specific standards the private providers must meet in order to become accredited agencies.*
- I. *These regulations contain detailed and comprehensive standards intended to ensure that the United States complies with the Convention, which requires:*
 - 1. *That accredited agencies and approved persons be directed and staffed by Persons qualified by their ethical standards and by training or experience to work in the field of intercountry adoptions.*
 - 2. *Be subject to supervision by competent authorities of the Convention country as to the composition, operations and financial situation.*
 - 3. *Accredited agencies and approved persons must also comply with the requirements of Article 2 of the Convention, which provide that no one shall derive improper financial or other gain from activity related to an intercountry adoption, only costs and expenses, including reasonable professional fees of persons involved in the adoption may be charged or paid.*
 - 4. *And that the key personnel of the agencies and persons involved in the adoption shall not receive remuneration, which is unreasonably high in relations to services rendered. The proposed regulations reflect the Convention requirements.*

COMMENTS Regarding: C. Use of the Private, Accredited Adoption Service Providers.

- A. *There appears to be a disregard and non-recognition by the Department of the present lawful and efficient infrastructure already in place within the United States of America. This infrastructure comes in the form of the each State's Child Placing Licensing*

Authorities who have been given the authority through their respective State Legislature to license or approve (or accredited agencies, if you will) for the purpose of performing international and domestic adoptions. Review of the rules from pages 54064-54119 shows that reference is continually made to persons performing adoption services in the USA as "private, non-profit adoption service providers" or "private bodies" who are in need of becoming "accredited agencies."

- B. **Fact:** Most agencies in the USA performing international adoption services are presently "accredited" or "licensed" or "approved" by their State Licensing Authorities through the State Division of Family Services. This authority is given to them through their own State Legislature and laws that were developed over the years governing the requirements and regulations surrounding international and domestic adoption.
- C. **Fact:** These State "licensed," "accredited" or "approved" child placing agencies are highly regulated, and are re-licensed on a bi-annual or annual basis to perform adoption services in alignment with State laws and Federal laws. Laws which happen to be consistent with the mission of the Hague Convention.
- D. **Fact:** The process of "licensing" or accreditation" or "approval" is not new to the USA, and the same has been in existence in some form or fashion of the last fifty years.
- E. **Fact:** The majority of the proposed rules set forth by the Department of State are presently implemented and practiced by already existing, "accredited," "licensed" and "approved agencies" within the United States of America.

Consider the Following Facts:

- 1. The concept and practice of lawful adoption through United States of America's Licensed Child Placing Agencies was well instituted and established long before the concept of the Hague Convention.
- 2. The United States of America through its State Licensed Child Placement Agencies maintains the highest standard of accreditation governing adoption practices in the world.
- 3. State licensed agencies are presently regulated in the USA at:
 - a. State levels through laws and rules set forth by their State Legislature and enforced by each State's Division of Family Services.
 - b. Each Licensed Social Worker is further governed by State professional licensing rules set forth by their own State Legislature and professional licensing boards.
 - c. Each licensed agency is required to adhere to the laws, and rules set out by the INS (now under the HomeLand Security).

- d. Each state imposes criminal, civil restrictions and penalties on practices that are not in alignment with the already established regulations and laws.
- e. Federal penalties are in place through the INS rules.
- f. Each state's local juvenile court further oversees the legality of a foreign adoption through the recognition of the foreign adoption or a re-adoption process through the court.
- g. In the United States of America there are State laws and Federal laws presently in place that prohibit the trafficking of children, sale of children, abduction and abuse of children.

Comment and Recommendation: We recommend that the RULE FOR ACCREDITATION BE:

The US Department of State and the Bureau of Consular Affairs has the authority to designate one or more accrediting entities. It therefore recognizes and designates each State's Licensing Authority and entity to give "approval" and "license" and/or "accreditation" to Child Placing Agencies for the purpose of conducting international adoptions within the purview of their respective State laws and regulations, Federal laws and rules of the INS. The US Department of State, and the Bureau of Consular Affairs will accept a State Licensed Child Placing Agency approved by its State Licensing Authorities as an "accredited agency" to provide adoption services for Convention adoptions.

III. Regarding D. Ability of U.S. Accredited Agencies and Approve Persons To Operate in Other Convention Countries.

As stated in the Departments proposed rules: "Thus, U.S. accredited Agencies and approved persons are NOT automatically entitled to operate in other Convention countries. In practice, this means that even if a U.S. agency or person is accredited or approved in the United States, another Convention country may choose to work with only U.S. accredited agencies or persons."

RATIONALE OF DEPARTMENT FOR THE PROPOSED STRINGENT RULES: *An important factor to consider that is written in the proposed rules 54-67: "One of the rationales for drafting comprehensive stringent standards for the U.S. accreditation and approval is to encourage other Convention countries to accept U.S. accreditation and or approval and not require further reaccreditation of approval."*

COMMENTS ON RATIONALE FOR STRINGENT RULES: Again, the author of the Department's rules negates the fact that the USA has the highest of standards already in place. It would be unlikely that a foreign

country with whom adoptions are conducted, would consider America's standards of adoption to be unacceptable to theirs, thereby denying the USA agency the ability to provide adoption services in their country or requiring them to go through an accreditation process which would be costly or unattainable. In most cases, American agency standards have been a model to foreign countries.

Further, I'm certain that most of the USA child placing agencies would rather come under an additional level of approval through a foreign country than to be put out of business by the Department's rules.

IV. COMMENT: SOME OF THE MAJOR RULES PROPOSED BY THE DEPARTMENT ARE UNNECESSARY AND PUNITIVE. Further, it is not so much that the proposed rules are "stringent." Most are redundant to already existing rules as laid out in each state, and Federal guidelines through the INS. There are added unnecessary and punitive rules, which have nothing to do with the mission of the Hague Convention and the IAA. Further, to assign another private enterprise to "accredit" and oversee already lawfully licensed or approved child placing agencies, will pose a serious financial burden to the agencies. A financial burden that will result in cost of million of dollars collectively and the eventual elimination of many non-profit child placing agencies who have served as the backbone of the adoption world. Further, the larger agencies who may survive, most certainly will have to increase their fees to meet the mandates of the proposed rules.

V. EXAMPLE OF PUNITIVE RULES as set for in the proposed rules:

A. Subpart F. 19618 (d) that accredited adoption agencies must maintain a cash reserve to meet operating expenses for three months.

COMMENT: Most State Licensed Child Placing Agencies are non-profit. They do not have the ability to call forth for investors or go on the stock exchange. They operate off of donations and agency fees. At times, they serve indigent clients, have sliding scales and/or reduced fees for some adoptive parents. They have traditionally in foreign adoption relations supported and raised funds for foreign orphans, street children and foster care orphans, provided clothes, toys, food, medicine, and other forms of support to foreign countries. Many child placing agencies serving Europe and countries around the world have spent hundreds of hours in time and in-kind services to provide support and help in foreign countries with regard to the orphan children. International adoption as performed through licensed child placing agencies, has built an international bridge of friendship between foreign countries and the United States of America.

We believe that these charitable efforts will be curtailed and in some cases, halted, as agencies will be forced to limit their giving to meet the financial demands of the proposed rules of the Department.

Further, we believe that the proposed rules governing finance are in clear violation of the Anti-trust laws in the USA.

- B. *Subpart F, 96.33 (h) that adoption agencies must carry \$1,000,000 per occurrence in professional liability insurance, covering all persons in the foreign country that help the family, including facilitators and drivers.*

COMMENT: The author of this rule retains little or no understanding that with foreign adoption comes substantial risks with children's emotional and physical health. That all parties for the most part, know that they are taking a risk in order to save a child's life through adoption. Many orphans have resided in orphanages since birth. In some cases, they have good care. In some cases children have been left to lie in cribs unattended or have suffered from other forms of neglect or abuse. Without proper stimulation they suffer from attachment disorders and neurological lags, and physical impairments.

Without the taking of risks there would be no foreign adoptions of children. Most agencies give as much information as possible about the child's living conditions and health, however, no one can offer assurances as to the total picture of a child's health, environment or well-being. We as USA agencies cannot be held responsible for the foreign agent's lack of knowledge of a child's living situation from birth, prediction of future emotional or physical effects because of past abuse or lack of health care. We all go forth in good faith getting as much information as possible with no assurances. We are able to guide adoptive parents to pediatricians in foreign countries who can help them assess medical data. We also encourage them to share information with their pediatrician in the USA before accepting an assignment of a child. Most of the licensed child placing agencies requires training surrounding attachment issues, neglect and how to remedy blocking points of a child's ability to bond or attach when he or she comes to live with the adoptive family. We are actively involved in the supervision and continual referral for therapy on an as needed basis. We are available through supervision to address adjustments, bonding issues as well as provide referral sources addressing neurological and other health issues.

- C. *Subpart F, 196.33 (b) states that each accredited adoption agency must have an independent financial audit yearly.* The estimated cost of such an audit is \$5,000.00 - \$10,000.00 per year. **COMMENT.** The yearly audit requirement will further be a financial burden on the agencies.

- D. *Subpart K, a 96.79 (a) states if the accrediting entity (likely to be the COA) denies an agency's application to be accredited, there is no means for appealing the decision. Agencies could NOT GO TO COURT. They CANNOT APPEAL to the State Department.*

COMMENT: An appeal process in a democracy should always be in place as part of due process. This is a rule that cannot be left to stand. To allow a private enterprise to put another private enterprise out of business is also a violation of the Anti-Trust Laws.

- E. *22 CFR Part 96 Subpart C 96.12 Regarding accreditation of agencies and accreditation from an outside agency outside of a State Licensing authority.* At this time the only organization in the USA that accredits adoptions agencies in the USA is the Council on Accreditation. For a medium sized agency the costs of accreditation, including fees to the COA, staff time to prepare the accreditation documents and going through site inspection will be at least \$30,000 to \$40,000 initially and the cost of \$15,000 to \$20,000 each year to maintain inspections.

- V. *Regarding Economic Impact/Effect on Small Entities.* The Department writes in Part: "There is no sufficient impact to warrant preparation of a regulatory impact analysis (RIA) under Executive Order 12866 or other similar mandates. In particular the Department has analyzed the proposed regulations and concluded that they will not have an annual effect on the economy of \$100 million or more or adversely affect in any material way the economy, jobs productivity, the environment, public safety or health."

COMMENT: We disagree with this statement. Based on the above stated expenses incurred will having to hold three months of operating capital, insurance, costs of audits and costs of accreditation, a regulatory impact analysis should be conducted (RIA) under Executive Order 12866. We believe that the costs of implementing the proposed rules by the Department would result in the sufficient impact of warrant preparation of a regulatory impact analysis (RIA) under Executive Order 12866 or other similar mandates. **The adoption agencies will be forced to raise their fees at least \$8,000.00 to \$10,000.00 per adoption to meet the mandates of the proposed rules of the Department.** If they do not raise their fees, hundreds of dedicated social workers, and adoption administrators will be put out of work. As agencies would be forced to close their doors, public safety and health would be affected, as orphans all over the world would die, be subject to abuse and left to live in unhealthy conditions. The agencies who so generously have given to the foreign countries would no longer be in existence to provide aid.

If fees are raised \$8,000.00 to \$10,000.00 the whole goal of "reasonable fees" would be eliminated by the Department's own rules.

It is very dangerous to our public safety and health to allow children to remain orphans around the world. The children grow up with no attachments to any human beings, suffer from emotional deprivation, and

are easy targets for pedophiles, pornographers, and prostitution rings. It is universally suspected that the orphans are easily recruited and kidnapped for terrorist training camps. That is if they even survive through hunger, homelessness, and hopelessness. We are not an island unto ourselves. If the Department's proposed rules put the lawful adoption agencies out of business, the criminal element will flourish.

VI. Recommended and Proposed Functions of the Department of State as the Central Authority:

- A. To keep a central registry and record of State Licensed Child Placing Agencies that are approved by their State Licensing Authority for purposes of providing adoption services for Convention adoptions and to acknowledge them as "accredited" to the Convention.
- B. To communicate with foreign countries with regard to laws, exchanging information about each other's laws.
- C. To keep a record of children entering and leaving the United States.
- D. To intervene on behalf of USA agencies and adoptive parents when there are interference's in the foreign countries with regard to international adoption.

IN SUMMARY:

1. We believe that the proposed rules by the Department go far beyond the mandates of the Hague Convention and the IAA provision to "Set forth minimum standards and requirements for accreditation and approval." (B. Overview of Substantive Provisions) 54068.
2. That the main goal of the Hague Convention to stop trafficking of children, child abduction, sale of children and kidnapping will not be met when lawful agencies are forced out of business. In fact, with the lawful agencies gone, the criminal element will take over to exploit, sell, and kidnap the orphaned children.
3. There will be a financial hardship on the agencies to carry out these proposed rules, and will cause adoption fees to be raised \$8,000.00 to \$10,000.00.
4. That for many agencies, jobs will be lost, as agencies will be forced to close their International programs.
5. That the infrastructure for "licensing" and "approval" and "accreditation" is presently in place through the Licensing Authority and entity of each State. The Department's proposed rules represent a costly duplication of present licensing and regulatory functions commanded by State Licensing Authorities.
6. That the Hague Convention goal of providing a permanent home for the orphan child will not be met as many adoptive parents will not be able to meet the cost of international adoption resulting from the proposed rules if implemented.
7. Some of the rules are a clear violation of the Anti-Trust laws.
8. That there is sufficient impact to warrant preparation of a regulatory impact analysis (RIA) under Executive Order 12866 or other similar mandates

9. The orphaned children the Convention is seeking to protect will be left to be grow up as orphans or die.

10. The rule regarding accreditation of agencies should be:

The US Department of State and the Bureau of Consular Affairs has the authority to designate one or more accrediting entities. It therefore recognizes and designates each State's Licensing Authority and entity to give "approval" and "license" and/or "accreditation" to Child Placing Agencies for the purpose of conducting international adoptions within the purview of their respective State laws and regulations, Federal laws and rules of the INS. The US Department of State, and the Bureau of Consular Affairs will accept a State Licensed Child Placing Agency approved by its State Licensing Authorities as an "accredited agency" to provide adoption services for Convention adoptions.

Thank you for taking the time to read and consider my comments.

Respectfully submitted,
Joan Bystrom, MSW, LCSW
Executive Director